

MEMO ENDORSED

LAW OFFICES  
**STILLMAN & FRIEDMAN, P.C.**

425 PARK AVENUE  
NEW YORK, NY 10022  
www.stillmanfriedman.com

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DGC #:
DATE FILED: 7/18/12

CHARLES A. STILLMAN  
JULIAN W. FRIEDMAN  
SCOTT M. HIMES  
MARJORIE J. PEERCE  
JOHN B. HARRIS  
JAMES A. MITCHELL  
MICHAEL J. GRUDBERG  
NATHANIEL Z. MARMUR

MARY MARGULIS-OHNUMA

NATHANIEL I. KOLODNY  
ELIZABETH S. WEINSTEIN  
ERIK M. ZISSU  
LAURA P. WEXLER

TELEPHONE  
(212) 223-0200  
FACSIMILE  
(212) 223-1942

**VIA HAND DELIVERY**

July 12, 2012

The Honorable Kimba M. Wood  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Ghavami, et al., 10 Cr. 1217 (KMW)

Dear Judge Wood:

On behalf of all parties in the above-referenced action, we respectfully submit the following requests relating to courtroom technology and other requests for trial:

1. Permission to bring and install the audio/visual equipment listed on the enclosed list to assist in the presentation and display of documentary and audio evidence to the Court, the jury and witnesses.

2. Permission for Andy Cepregi of Doar Litigation Consulting ("Doar"), a third-party vendor retained by defendants that is providing equipment for use by all the parties, to assist in the delivery, set-up, testing and operation of the requested audio/visual equipment prior to and during trial. Permission for Scott Minning, a technology employee from the United States Department of Justice, to assist with the set-up and testing of the equipment. Defendants also request permission for Mr. Cepregi to daily bring to the courthouse a laptop computer and a small server to coordinate and operate the courtroom technology on behalf of defendants.

3. Permission during the trial to use the witness room outside Courtroom 18B as a defense workroom in which will be stored a laptop computer, printer, a MiFi card (or wireless router), and copies of paper documents.

4. Permission to enter the courtroom on Thursday July 19 at 10:00 a.m., or at a time convenient for the Court, to deliver, set-up and test the audio/visual technology described

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above. Defendants also request that during that time, Doar be permitted to set up the computer and printer in the witness room outside Courtroom 18B room. Doar will deliver the audio/visual equipment by means of a white DOAR van, a Ford Eco- Line 150, New York License # 28128 JR, driven by Doug Briggs.

5. Permission for the attorneys listed on the enclosed standard form order, each of whom has a Southern District service pass, to bring in a General Purpose Computing Device as permitted pursuant to Southern District Standing Order M10-468, dated Feb. 17, 2010.

The parties have conferred with the Court's Deputy, Sara Lajoie, regarding the above-listed matters and are endeavoring to work with the Courthouse staff to ensure that the preparation and conduct of the trial is as efficient as possible while causing minimal disruptions, including the installation of a third row of counsel tables in the courtroom. Should the Court grant the parties' requests, we will continue to coordinate these matters with Ms. Lajoie.

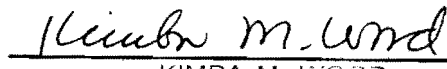
Respectfully,



Erik M. Zissu

Enclosures

cc: Counsel of Record (*via e-mail*)

SO ORDERED: 7/18/12  
  
\_\_\_\_\_  
KIMBA M. WOOD  
U. S. D. J.



**U.S. v Ghavami Courtroom Technology Package**

Below please find a list of the equipment we intend to bring for the set up on July 19, 2012. We will be driving a White DOAR van, a Ford Eco- Line 150, New York License # 28128 JR. The driver will be Doug Briggs.

<b><u>Court room Room Technology Package</u></b>	<b><u>Description</u></b>
1 - Sanyo 7000 Lumens Projector w/Long Throw Lens	Central Monitor
1 - 8' x 10' (12' Diagonal) Projection Screen	Da-Lite FastFold
7 - Dell 17"Flat Panel Monitors	17" Monitors for use by Attorneys, Court, Witness, and Clerk
5 - VGA Distribution Amplifiers	Distributes Video Signal
1 - VGA Switcher	Controls Display
1 - A/V Tables w/Skirt	Tables For Equipment
2- Bose Panaray Speakers	Speakers for audio presentation.
1 - Cabling	
1 - Audio Mixer	Augmentation of sound for 3 <sup>rd</sup> table
2 - Gooseneck microphones	Augmentation of sound for 3 <sup>rd</sup> table
1 - Printer	
1 - Wireless Router	For Connection to printer